



◊ Boulevard Manor ◊ Heritage Manor ◊ Lakeside Manor ◊ Oakland Manor ◊ Oakridge Manor
◊ Regency Manor ◊ Pine Creek Manor ◊ Pioneer Specialty Hospital ◊ Pioneer Health Care Management ◊ Rehab Max

Corporate Compliance Plan Code of Conduct

Our organization is committed to providing quality care and services to our patients and residents. We will:

- Treat all patients and residents with dignity, respect and courtesy and in a manner that respects each person's background, culture, religion, and heritage.
- Provide medical care, treatments, and services within our capability to our patients and residents without regard to race, color, creed, national origin, age, gender, or financial status.
- Listen to and do our best to understand the needs of our patients and residents, families and visitors and act promptly to resolve grievances or complaints.
- Encourage patients and residents to participate in decisions regarding their medical care and treatments, and in the development of their plan of care.
- Ensure that clinical duties are performed in accordance with current acceptable professional standards of practice.
- Ensure that staff attend and participate in training programs that address resident care issues in an environment that supports teamwork and quality of care.
- Conduct appropriate background checks and verify credentials, licenses, certifications, etc., as well as qualifications of health care professional providing care or services to patients and residents of our organization.
- Provide patients and residents with an opportunity to choose medical care, services, pharmacies, equipment, etc., from available sources within our community or service area.
- Transfer patients and residents in accordance with established policy that provides for continuing care based upon the person's assessed needs at the time of the transfer.
- Adhere to the Patients's Bill of Rights as set forth in the Medicare and Medicaid Conditions of Participation where applicable as well as other applicable laws or regulations governing patient and resident rights.

Compliance with Laws, Regulations and Guidelines

Our organization will provide healthcare services and conduct our business affairs in compliance with applicable laws, regulations and professional standards. We will:

- Comply with current OSHA, CDC and Risk Management reporting policies and requirements.
- Refrain from engaging in illegal business practices, including bribery, kickbacks or payoffs intended to induce resident referrals, admissions, favorable terms or treatment, or for the purchase of goods or services.
- Refrain from entering into employment or other agreements with an individual or firm that has been excluded from participation in federal or state reimbursement programs.
- Market and advertise truthfully and accurately.
- Comply with current laws, rules, regulations and guidelines that apply to our organization and the types of services provided.
- Conduct business relationships and enter into transactions with physicians, providers, consultants, clinical practitioners and vendors and entities/agencies in a manner which, at a minimum, meet the following criteria:
 - Specifically defines the transaction and the respective parties' duties and obligations; and
 - In the case of purchase or sale of real or personal property, goods or services, the real or personal property, goods and/or services are specifically identified in the agreement; and
 - Amounts paid or received by the organization shall be consistent with fair market value; and
 - Transactions shall be commercially reasonable and conducted at arms-length.
- Conduct financial matters in a manner consistent with generally accepted accounting principles and in accordance with guidelines established by current Medicare and Medicaid Cost Reporting and Consolidated Billing requirements.

- Comply with the False Claims Act, a federal law that makes it a crime for any person or organization to:
 - knowingly presenting, or causing to be presented, a false or fraudulent claim for payment or approval;
 - knowingly making, using, or causing to be made or used, a false record or statement material to a false or fraudulent claim;
 - conspiring to commit a violation of the Federal False Claims Act;
 - and knowingly making, using, or causing to be made or used, a false record or statement material to an obligation to pay or transmit money or property to the Government, or knowingly concealing or knowingly and improperly avoiding or decreasing an obligation to pay or transmit money or property to the Government.
 - The False Claims Act protects employees who report a violation under the False Claims Act from discrimination, harassment, suspension or termination of employment as a result of reporting possible fraud. Employees who report fraud and consequently suffer discrimination may be awarded (1) two times their back pay plus interest, (2) reinstatement of their position without loss of seniority and (3) compensation for any costs or damages they incurred, (4) any other relief necessary to make the employee whole.
 - The False Claims Act allows for an individual (called a qui tam plaintiff or relator) who is an original source of information, can sue for violations of the False Claims Act. Under both the federal False Claims Act and the MIMFCA, a qui tam plaintiff can receive between 15-25% of the total amount recovered if the government prosecutes and 25-30% if litigated by the qui tam plaintiff.

Safeguarding Assets, Property and Information

Our organization will use its resources wisely and will be accountable for their proper use. We will:

- Maintain, preserve and be responsible for our organization's assets, property, facilities, equipment and supplies, as well as employee and resident property, which is our legal responsibility.
- Report work-time records accurately and use work-time responsibly.
- Ensure that organization property is disposed of appropriately and in accordance with established policy.
- Use E-Mail and Internet, as well as other electronic communications responsibly.
- Release organization financial and other related information only in accordance current law and organization policy governing the release of information.
- Introduce computer programs, software, or files into our computer system only when authorized by the Administrator and governing board.
- Safeguard passwords and security codes to protect both our organization and the user. The sharing of passwords or security codes is prohibited.
- Prohibit others from using a computer terminal after an employee is logged on or when the employee is entering his/her password or code.

Respecting and Protecting Confidentiality of Information

Our organization will respect and protect the use of and/or release of confidential information concerning our business, patients and residents or employees. We will:

- Maintain confidentiality of our business information and release such information only to authorized individuals or agencies with a need-to-know or in accordance with current laws and regulations governing the release of information to federal/state agencies as the result of our organization's participation in the Medicare or Medicaid Programs.
- Maintain confidentiality of information concerning our person's medical treatment, finances, assessments, etc., by using and sharing such information according to current applicable laws, regulations and guidelines.
- Follow our organization's established policies and procedures with respect to the proper authorization and disclosure of confidential information.
- Limit restricted information to those who need to know.
- Respect the person's privacy and information by discussing confidential information at appropriate times and in appropriate places.
- Prohibit the release of business/resident information without appropriate approval and in accordance with our established procedures. This includes, but is not limited to the release of computer data files, financial information or reports, resident lists, charges or fee structure, computer programs, or other organizational information.

Coding, Billing and Collection Practices

Our organization is committed to integrity in our coding, billing and collection practices. We will:

- Maintain honest and accurate records of services provided to each resident.
- Follow current coding principles and applicable billing laws, regulations and guidelines to facilitate the proper documentation, coding and billing of claims.
- Take necessary steps to prevent the submission of claims for payment and reimbursement of any kind that are fraudulent, abusive, inaccurate or medically unnecessary, including, but not limited to the following:
 - Knowingly billing for items or services that do not meet industry/organization standards/guidelines for medical necessity.
 - Knowingly submitting claims to third party payers for items or services not ordered or certified by the appropriate healthcare professional.
 - Knowingly submitting false claims to Medicare Part A for patients and residents who are not eligible for such coverage.
 - Knowingly providing misleading information about a person's medical condition or upcoding the resident assessment (MDS) to obtain a higher level of reimbursement.
 - Knowingly billing for items covered under the organizations' basic per diem rate or reimbursed by a third party payer.
 - Unbundling claims (submission of bills in a fragmented fashion to maximize reimbursement if guidelines require the services be billed as one unit).
 - Submitting duplicate bills (more than one claim for the same service).
 - Forging a healthcare professionals or beneficiaries' signature on documents used to verify that such services were ordered and/or provided.
 - Knowingly falsifying information contained in and/or knowingly filing a fraudulent cost report.
 - Failing to maintain documentation consistent with professional/industry standards that support the diagnosis, justifies treatment, and documents the course of treatment and results.
- Take immediate steps to correct billing errors, alert the payor of such discovery and promptly refund any over payments.
- Provide an effective process to resolve resident billing issues.
- Pursue collection of accounts in a professional manner and in accordance with organization policy.

Promoting Fair Employee Treatment

Our organization is committed to providing a work environment that promotes equal employment opportunities and compliance with all matters relating to employment issues. We will:

- Demonstrate appropriate respect and consideration for one another.
- Apply our Human Resource Policies and Procedures fairly and equitably, consistent with applicable legal requirements.
- Hire, train, promote and compensate employees without regard to race, color, creed, national origin, age, gender, marital status, religion, physical/mental disability or other classification protected by law.
- Maintain a work environment free from harassment, disruption, intimidation or hostility.
- Encourage open expression of concerns and use of our problem-solving process without fear of retaliation.
- Protect an employee's job status, working conditions or employment relationship if he/she, in good faith, reports abuse, mistreatment, neglect or violations of our compliance program or established organization policies and procedures.

Conflicts of Interest

Our organization will conduct its business affairs with integrity, honesty and fairness to avoid conflict between personal interests and the interest of our organization.

- Employees may not accept, either directly or indirectly, compensation or gifts of cash, services or any items of value from physicians, vendors, clinical practitioners, consultants, patients and residents, their families, visitors or others in exchange for favorable treatment, referral of patients and residents, items or services.
- Employees must avoid accepting or providing benefits that could be construed as conflicting with our organization's legitimate business and personal interests, including without limitation, meals, gifts, refreshments, transportation, or entertainment provided or received in connection with your job or position.
- Employees and/or agents involved in the negotiation of contracts for our organization shall ensure that all statements, communications, and representations are accurate, complete, and truthful and comply with current applicable laws and regulations.

- Employees may not ask for or provide, directly or indirectly, compensation or gifts of cash, services or any items of value to physicians, vendors, clinical practitioners, consultants, patients and residents, their families, visitors or others in exchange for referrals or items or services provided by or at our organization.
- Employees possessing or who has access to resident/provider information shall maintain such information so as to protect against improper access or use by individuals who do not have authority to access or use such information.
- Involvement, directly or indirectly, in outside commercial interests that could influence the actions of the employee constitutes a conflict of interest. This may include, without limitation, endorsing products or services on behalf of our organization or patients and residents without explicit prior consent or approval from the organization or patients and residents.
- Employees must avoid any actions that involve, or that may reasonably be construed as improperly influencing them or giving rise to an actual or potential conflict of interest with our organization or its business obligations, including without limitation, placement of business with a firm wherein the employee has a direct or indirect interest or employment or financial relationship with a competitor.
- The placing of organization business with any firm in which there is a family relationship must have written approval from the organization's governing board.
- All fundraising permitted by organization policy must be conducted ethically.
- Token promotional items, such as key chains, pens, or pencils marked with the donor's name, are not considered inappropriate when given in individual or limited quantities.

Maintaining a Safe Environment

Our organization is committed to providing our patients and residents, their families, visitors and staff with a safe and healthful environment. We will:

- Identify, correct, repair and/or report unsafe practices, conditions or potential hazards that may violate a rule, regulation or safety standard to appropriate organization personnel and/or government agencies as required by current law and regulations.
- Use care in the handling and disposal of medical waste or other potentially infectious materials.
- Take necessary steps to prevent and respond in a prompt and appropriate manner to any incidents of threats of violence, and immediately report such information to appropriate security and law enforcement agencies.
- Follow the manufacturer's guidelines when using equipment, property and medical products.
- Take necessary steps to identify and eliminate hazards to the health and safety of employees, patients and residents and visitors.
- Take necessary steps to prevent, and respond in a prompt and appropriate manner to any employee use, manufacture, distribution, dispensation, or possession of illegal drugs either on or off the job, use of non-prescribed controlled substances, or from reporting to work under the influence of alcohol or illegal drugs.

Compliance Concerns and Reporting Guidelines

It is the responsibility of all employees, contractors, physicians, patients and residents, family members, consultants, vendors, and anyone else acting on behalf of our organization to follow all laws, regulations and guidelines set forth by our organization and applicable government agencies. Should you believe a violation has occurred, or you suspect a violation:

- Report your concern to your supervisor or you may report such information directly to the Corporate Compliance Officer.
- If you wish to remain anonymous, file a written, typed or computerized report to our Corporate Compliance Officer.
- Should you choose to identify yourself, your identity will be protected to the limit of the law.

The Corporate Compliance Officer will investigate all reported incidents.

Our organization is committed to ensuring that persons reporting violations are allowed to report such concerns without fear of retaliation. Our compliance officer will investigate immediately any potential violations of our non-retaliation policy. Substantiated violations will result in appropriate disciplinary action, up to and including termination of employment.